

DK-99-25

**From:** Claudette Artwick <artwick.c@wlu.edu>  
**To:** K2DOM.K2PO1(GTRISTAN),K4DOM.K4PO2(MPOWELL,SNES),K...  
**Date:** Tue, Jul 13, 1999 9:35 AM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

ORIGINAL

=To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton Vice President Al Gore,  
Bill Bradley, and George Bush, Jr.  
cc: Microradio Empowerment Coalition

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

EX PARTE OR LATE FILED

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd  
List ABCDE

041

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities.

In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director, Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author

Additional Comments=  
name=Claudette Artwick  
street=Washington & Lee Univ.  
city=Lexington  
state=VA  
zip=24450  
=Send to FCC

**From:** <mykarolak@aep.com>  
**To:** K1DOM.K1PO1(BKENNARD),K2DOM.K2PO1(GTRISTAN),K4DOM....  
**Date:** Tue, Jul 13, 1999 8:44 AM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

DK-9925  
ORIGINAL

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton Vice President Al Gore,  
Bill Bradley, and George Bush, Jr.  
cc: Microradio Empowerment Coalition

EX PARTE OR LATE FILED

MM Docket No. 99-25

Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio

No. of Copies rec'd  
List ABCDE

OH

increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities. In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to

"secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:

Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia  
Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director, Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author  
Melissa Karolak  
1824 Ridgebury Drive  
Hilliard, OH 43026



DK-99-25  
**ORIGINAL  
RECEIVED**

**From:** Scott Kamana Stewart <kamana@slip.net>  
**To:** K1DOM.K1PO1(BKENNARD),K4DOM.K4PO2(SNESS,MPOWELL),K...  
**Date:** Mon, Jul 12, 1999 6:30 PM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

=To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton Vice President Al Gore,  
Bill Bradley, and George Bush, Jr.  
cc: Microradio Empowerment Coalition

EX PARTE OR LATE FILED

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd 0/1  
List ABCDE

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities. In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director, Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author

Additional Comments=  
name=Scott Kamana Stewart  
street=4027 Cesar Chavez st  
city=San Francisco  
state=CA.  
zip=94131  
=Send to FCC

DK-99-25

**From:** DS <dnhsut@easystreet.com>  
**To:** K2DOM.K2PO1(GTRISTAN),K4DOM.K4PO2(MPOWELL,SNES),K...  
**Date:** Tue, Jul 13, 1999 12:34 AM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

ORIGINAL

=To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton Vice President Al Gore,  
Bill Bradley, and George Bush, Jr.  
cc: Microradio Empowerment Coalition

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

EX PARTE OR LATE FILED

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd 041  
List ABCDE

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities. In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director, Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author

Additional Comments=  
name=David Sutherland  
street=8665 SW Canyon Ln. #31  
city=Portland  
state=OR  
zip=97225  
=Send to FCC



DK-99-25

**From:** Merrill Cole <merrill@u.washington.edu>  
**To:** K1DOM.K1PO1(BKENNARD),K4DOM.K4PO2(SNESS,MPOWELL),K...  
**Date:** Tue, Jul 13, 1999 12:13 AM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

ORIGINAL

To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton, Vice President Al Gore,  
Bill Bradley, and George W Bush  
cc: Microradio Empowerment Coalition

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd  
List ABCDE

071

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities. In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

**Merrill Cole**  
3814 Latona Ave. N.E., #5  
Seattle, WA 98105

"For dreams have only the pigmentation of fact. A man who has to deal in no colour cannot find his match, or, if he does, it is for a different rage." From Djuna Barnes' \_Nightwood\_.  
XX

XX  
XX

DK-99-25

**From:** Alison Moski <drggon@javanet.com>  
**To:** K2DOM.K2PO1(GTRISTAN),K4DOM.K4PO2(MPOWELL,SNES),K...  
**Date:** Mon, Jul 12, 1999 11:35 PM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

ORIGINAL

=To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton Vice President Al Gore,  
Bill Bradley, and George Bush, Jr.  
cc: Microradio Empowerment Coalition

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd 0+1  
List ABCDE

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities. In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director, Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author

Additional Comments=  
name=Alison Moski  
street=1663 Middletown Ave  
city=Northford  
state=CT  
zip=06472  
=Send to FCC



DK-99-25

**From:** rachel melman <rmelman@earthlink.net>  
**To:** K2DOM.K2PO1(GTRISTAN),K4DOM.K4PO2(MPOWELL,SNESS),K...  
**Date:** Mon, Jul 12, 1999 10:39 PM  
**Subject:** In Support of the MEC Letter on MM Docket No. 99-25

ORIGINAL

=To: The Honorable William E. Kennard Chairman,  
Commissioner Gloria Tristani,  
Commissioner Michael Powell  
Commissioner Susan Ness  
Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
The Portals 455 Twelfth Street S.W. Washington, DC 20554  
cc: President Clinton, Hillary Clinton, Vice President Al Gore,  
Bill Bradley, and George W Bush  
cc: Microradio Empowerment Coalition

RECEIVED

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-25  
Regarding The Creation of Low Power FM Licenses: RM-9242, RM-9208

Dear Honorable Chairman Kennard,

We are writing to commend you and the Federal Communications Commission for taking action on an issue of great importance to us - ending the 21-year ban on community access to the airwaves. We have become increasingly concerned about the growing concentration of the media in our country and are pleased that the Commission is responding to public outcry to increase opportunities for local communities to use our radio airwaves.

One of the fundamental tenets of our democracy is to ensure that diverse interests have opportunities to express themselves, not merely to be the recipients of what a handful of other people tell them. It is a nonnegotiable component of our right to a free press and free speech.

Radio is perhaps the most qualified of any media outlet to provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. Unfortunately, over the past three years the U.S. radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of our major media. Even a multimillionaire would have trouble entering the radio broadcasting industry today, because economies of scale (permitted by deregulation) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic industry that has less and less competitive pressure to heed the diverse, local needs of listeners. And, for poor people and others who are considered unimportant to the advertising community, radio increasingly has little to offer. Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible

No. of Copies rec'd 0+1  
List ABCDE

local service for democratic communications of interest and value to the entire population.

Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations would create much needed public fora for a variety of groups - including community activists, youth, ethnic and linguistic minorities, the religious community, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from "mainstream", profit-driven media.

The strong interest in independent radio stations shows that the creation of low power radio service would have wide public support. The tremendous demand for microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission's aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

In addition, the Commission has stated that in the last year alone, 13,000 people inquired regarding the possibility of obtaining a license for low power broadcasting in their communities.

In support with the efforts of the Microradio Empowerment Coalition ([mec@tao.ca](mailto:mec@tao.ca)), we urge you to legalize microradio in order to benefit non-commercial community groups whose interest in microradio is to communicate, to educate, and to inform, not to make money. We are confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, we urge you to legalize microradio with the following concerns in mind:

1. Microradio licenses should be awarded for non-commercial use only. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate with their neighbors, not make profit from them.
2. Licenses should be held locally, be non-transferable, affordable to all communities, easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should be up to 100 watts in urban areas and up to 250 watts in rural areas.
4. The Commission should NOT diminish new low-power stations to "secondary status." It would be a tragedy to take away licenses from low-power community stations just because the Commission

subsequently granted a power increase to a pre-existing station or granted a new high power license somewhere nearby.

5. The Commission should grant full amnesty for the microbroadcast pioneers who have suffered government seizure and fines. Their property should be returned. They should be granted equal opportunity in applying for and receiving new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micropower organization for assistance or mediation (e.g. the Ham radio model). The FCC should be the forum of last resort.

7. LPFM must be protected and maintained in the future as radio makes the transition from analog to digital broadcasting.

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a 2 year "headstart" for non-commercial licenses. The right of citizens to communicate is protected by the Constitution and the FCC's mandate. The right to make money through local radio is not a protection under the FCC's mandate.

9. Stations should be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.

10. Licenses should be awarded to unincorporated non-commercial associations, and non-profit organizations.

11. Within two years new spectrum space (including any future digital spectrum space) should be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States should be required to include this spectrum set aside for microradio broadcasters.

12. Licensing fees should be affordable to all communities.

Again, we commend Chairman Kennard and the Commission for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. We look forward to working on making the airwaves more accessible for our local communities.

Signed,

MEC Honorary Chair:  
Robert W. McChesney, Madison

Steering Committee:  
Sara Zia Ebrahimi, Philadelphia  
Diane Fleming, Philadelphia

Peter Franck, San Francisco  
Amanda Huron, Washington, D.C.  
Alan Korn, San Francisco  
Greg Ruggiero, New York City

Robert W. McChesney-- University Of Illinois, Urbana  
Noam Chomsky--Massachusetts Institute of Technology  
Howard Zinn--Professor Emeritus, Boston University  
Nancy Kranich--Librarian  
Ron Daniels--Executive Director ,Center for Constitutional Rights  
George Gerbner--Founder, Cultural Environment Movement  
Edward Herman--Wharton School, University of Pennsylvania  
Janine Jackson--Fairness and Accuracy in Reporting  
Mark Crispin Miller--New York University  
Laura Flanders--national producer for Pacifica Radio  
David Barsamian--Director, Alternative Radio  
Stewart Ewen -- Author  
Gary Ruskin, Director, Commercial Alert  
Elaine Bernard--Harvard Trade Union Program  
Al Lewis--Organizer ("Grandpa" from the Munsters)  
Dee Dee Halleck--Deep Dish TV  
Ben Bagdikian--University of California, Berkeley  
Loretta Ross--Executive Director, National Center for Human Rights Education  
Carl Jensen--Founder, Project Censored  
Ellen Braune--Publicist  
Jamie Love--Director, Consumer Project on Technology  
Dan Simon--Founder, Seven Stories Press  
Juliet Schor--Harvard University  
Herbert Schiller--Professor Emeritus, University of California, San Diego  
Barbara Ehrenreich--Author  
Gloria Steinem--Ms.  
Mumia Abu-Jamal--Journalist  
Kurt Vonnegut-- Author

Additional Comments=  
name=Rachel Melman  
street=PO Box 1220 Canal St Station  
city=New york  
state=NY  
zip=10013  
=Send to FCC